

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Natchitoches Plant
Weyerhaeuser Company
Natchitoches, Natchitoches Parish, Louisiana
Agency Interest Number: 3782
Activity Number: PER20070002
Draft Permit 1980-00016-V4**

I. APPLICANT:

Company:

Weyerhaeuser Company
234 Industrial Avenue, Natchitoches, LA 71457

Facility:

Natchitoches Plant
234 Industrial Avenue, Natchitoches, Natchitoches Parish, Louisiana
Approximate UTM coordinates are 491.20 kilometers East and 3518.10
kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Natchitoches Plant, an existing laminated lumber manufacturing facility, began operation prior to 1973. Permit Number 1980-00016-01 was issued to the facility on January 16, 1985, and was modified in 1986, 1992, and 1994. Initial Part 70 Operating Permit Number 1980-00016-V0 was issued to the facility on June 25, 1997, and modified on April 29, 1999. The Natchitoches Plant currently operates under Permit No. 1980-00016-V2, issued February 18, 2003.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Weyerhaeuser Company on August 15, 2007, requesting a Part 70 operating permit renewal and modification.

With this modification, Natchitoches Plant proposes to renew its Part 70 permit as well as to:

- Extend the press hood vents in order to improve capture of press emissions;
- Install Press No. 1B (EQT 15) and incorporate it into the existing Press Cap

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(GRP 2). The production rate limitation imposed by the cap will not be altered;

- Route emissions from the Press No 1B to either press cyclone (EQT 2 or EQT 6), provided that emissions from either cyclone do not increase beyond the limits set forth in this permit;
- Route excess steam from the Gas Fired Boiler (EQT 1) to the I-Line Oven (EQT 14) in order to reduce fuel costs, provided that the emissions from either EQT 1 or EQT 14 do not increase beyond the limits set forth in this permit;
- Increase maximum hourly emissions and hourly glue usage for the existing presses (EQT 9 – EQT 13) and the new press (EQT 15);
- Increase usage of sealers, cleaners, and inks related to an actual production increase. This production increase will not exceed the production limitation imposed by the Press Cap (GRP 2); and
- Increase fugitive road dust emissions generated by additional traffic.

Project Description

The Natchitoches Plant produces unique laminated lumber products. During the pressing process, dry veneer is fed into a laminated lumber machine, which applies glue adhesives, stacks the veneer sheets, and hot presses the sheets together with a steam heated press producing the laminated lumber. This process can generate particulate matter and VOC emissions from the pressing of the adhesive. The laminated lumber is cut to length and width with various saws. Sawdust and wood waste are generated during various stages of operation and are contained by the pneumatic vacuum system. The collected air and dust are separated with a system of cyclones, which serves to minimize the release of collected particulates into the atmosphere. A natural gas fired boiler is used to produce steam for heating the presses.

In addition to laminated board production, wooden I-beams are produced at the site using laminated lumber products. For this process, the laminated lumber products are glued together with web stock using a catalyst driven adhesive and then placed in a bake oven for curing. After curing, the I-beams are checked for product quality and prepared for shipping.

Section 6 of the Permit Application, dated May August 15, 2007, lists the permitted emission rate before and after the project (in tons per year) for each emission point in the permit. These changes are summarized in the Permitted Air Emissions Section.

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Permitted Air Emissions

Estimated changes in permitted emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	206.00	206.06	+ 0.06
SO ₂	0.08	0.08	-
NO _x	19.14	19.14	-
CO	40.29	40.29	-
VOC*	227.27	234.18	+ 6.91

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

<u>Pollutant</u>	<u>Emissions</u>
Benzene	< 0.001
Formaldehyde	6.79
Methanol	55.34
Phenol	2.63
Total	64.76

Prevention of Significant Deterioration Applicability

The pollutants are not being increased by significant amounts by the project. Therefore, the proposed facility is not subject to the requirements of the PSD program.

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, NESHAP, and Louisiana Air Quality Regulations. NSPS regulations do not apply.

MACT Requirements

Natchitoches Plant is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Methanol is emitted in an amount in excess of the major source threshold. Formaldehyde, methanol, and phenol each exceed their respective Minimum Emission Rate (MER). MACT for this facility is to test each batch of LVL resins for phenol and formaldehyde and I-Line resins for phenol concentrations. Any time that the I-Line resin formulation changes, it must be tested for the presence of formaldehyde. Phenol concentrations must remain below 0.10% by weight for LVL resins and 9.0% by weight for I-Line resins. Formaldehyde

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concentrations must remain below 0.09% by weight for LVL resins and 0.003% by weight for I-Line resins.

The facility complies with the ambient air standards (AAS). This facility is subject to 40 CFR 63 Subpart DDDD-Plywood and Composite Wood Products and submitted an initial notification report on January 20, 2005.

Air Modeling Analysis

No dispersion modeling was performed.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

Regulatory Analysis

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit.

IV. Permit Shields

There is no permit shield.

V. Periodic Monitoring

Weyerhaeuser Company is required to monitor and record opacity on a daily basis using EPA Reference Method 22 for all cyclones and baghouses in order to assure compliance with LAC 33:III.1311.C.

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Weyerhaeuser Company is required to monitor and record the presence of visible emissions above those observed during normal operations on a weekly basis using EPA Reference Method 22 for all press vents in order to assure compliance with LAC 33:III.1311.C.

Compliance Assurance Monitoring

Federal regulation 40 CFR 64-Compliance Assurance Monitoring is not applicable to this facility.

VI. Applicability and Exemptions of Selected Subject Items		
ID No:	Requirement	Notes
EQT 1	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c]	DOES NOT APPLY. Units constructed prior to June 9, 1989. [40 CFR 60.40c(a)]
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. Units emit less than 250 tons of SO ₂ per year. [LAC 33:III.1503.C]
EQTs 9-15	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT. Waste gas has a VOC concentration of less than 30,000 ppm. [LAC 33:III.2115.H.1.d]

VII. Streamlined Requirements			
Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Natchitoches Plant	None	-	-

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VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) - A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to

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ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) - A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) - An oxide of sulphur.

Title V permit - See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.

Dustin Duhon

From: Wells, Shane [Shane.Wells@weyerhaeuser.com]
Sent: Monday, January 28, 2008 9:18 AM
To: Dustin Duhon
Subject: RE: Regarding Natchitoches Plant (AI 3782)

Dustin,
I apologize it was completely my fault for not getting back with you on this one. See email below answering your original questions from the plant.

Shane

From: Merrell, Kelton
Sent: Monday, January 28, 2008 9:10 AM
To: Wells, Shane
Subject: FW: Resin Testing

From: Merrell, Kelton
Sent: Friday, December 21, 2007 1:44 PM
To: Wells, Shane
Subject: RE: Resin Testing

I have found no instances were we have failed the testing.

For LVL resin:

During peek operating we may have 7 or 8 batches a week.

Usually we will average testing one batch per week.

For I-line:

We may have 6 or 7 batches per month.

Usually we will average testing one batch per month.

I propose that we test 1 batch per month for LVL resin and 1 batch per quarter for I-Line resin.

Kelton

From: Wells, Shane
Sent: Monday, January 28, 2008 8:51 AM
To: Dustin Duhon
Subject: RE: Regarding Natchitoches Plant (AI 3782)

1/28/2008